

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>GERDA ZINNER and STORY VANNESS,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 3:23-cv-00535</b>
	)	
<b>THE STATE OF TENNESSEE;</b>	)	<b>Judge Aleta A. Trauger</b>
<b>STATE INSURANCE COMMITTEE, THE</b>	)	
<b>STATE INSURANCE COMMITTEE</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>MEMBERS IN THEIR OFFICIAL</b>	)	
<b>CAPACITIES (Jim Bryson, David Lillard;</b>	)	
<b>Jason Mumpower; Carter Lawrence; Juan</b>	)	
<b>Williams; Bo Watson; Patsy Hazelwood;</b>	)	
<b>Michelle Consiglio-Young; Judi Knecht;</b>	)	
<b>Terry Carroll; and Holly Girgies); LOCAL</b>	)	
<b>EDUCATION INSURANCE COMMITTEE;</b>	)	
<b>LOCAL EDUCATION COMMITTEE</b>	)	
<b>MEMBERS IN THEIR OFFICIAL</b>	)	
<b>CAPACITIES (Jim Bryson; David Lillard;</b>	)	
<b>Jason Mumpower; Carter Lawrence;</b>	)	
<b>Maryanne Durski; Kristy Baddour; Erin</b>	)	
<b>Johnson; and Jennifer White); TENNESSEE</b>	)	
<b>DEPARTMENT OF FINANCE AND</b>	)	
<b>ADMINISTRATION; THE COMMISSIONER</b>	)	
<b>OF THE DEPARTMENT OF FINANCE</b>	)	
<b>AND ADMINISTRATION IN HIS</b>	)	
<b>OFFICIAL CAPACITY, Jim Bryson; THE</b>	)	
<b>UNIVERSITY OF TENNESSEE; THE</b>	)	
<b>PRESIDENT OF THE UNIVERSITY OF</b>	)	
<b>TENNESSEE SYSTEM IN HIS OFFICIAL</b>	)	
<b>CAPACITY, Randy Boyd; KNOX COUNTY</b>	)	
<b>BOARD OF EDUCATION,</b>	)	
	)	
<b>Defendants.</b>	)	

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**STATE DEFENDANTS' MOTION FOR LEAVE  
TO INCREASE PAGE LIMITS FOR REPLY BRIEF**

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Defendants State of Tennessee; the State Insurance Committee; the Members of the State Insurance Committee in their official capacities (Jim Bryson, David Lillard, Jason Mumpower, Carter Lawrence, Juan Williams, Bo Watson, Patsy Hazelwood, Michelle Consiglio-Young, Judi

Knecht, Terry Carroll, Holly Girgies); the Local Education Insurance Committee; the members of the Local Education Committee in their official capacities (Jim Bryson, David Lillard, Jason Mumpower, Carter Lawrence, Maryanne Durski, Kristy Baddour, Erin Johnson, and Jennifer White); the Tennessee Department of Finance and Administration; the Commissioner of The Department of Finance Administration in his Official Capacity, Jim Bryson; The University of Tennessee; the President of the University of Tennessee System in his Official Capacity, Randy Boyd (collectively, the “State Defendants”) respectfully request leave for an enlargement of the five page limit to their reply brief in support of their motion to dismiss to a limit of ten pages. The Motion and Response raise numerous issues and address claims by different Plaintiffs whose legal posture differ relative to the State Defendants. Given the complexity of these multiple issues, the Parties have previously filed briefs with expanded page limits. Additionally, the U.S. Department of Justice (“DOJ”) has supplemented Plaintiffs’ briefing with an 11-page Statement of Interest in support of Plaintiffs. The requested expansion is necessary to adequately address the issues presented to the Court in the Parties’ and DOJ’s prior briefing.

Pursuant to L.R. 7.01(a)(1), counsel has conferred with the parties’ counsel of record. Plaintiffs oppose the relief requested herein. Knox County Board of Education does not oppose the requested relief.

Respectfully submitted this 3rd day of October, 2023.

/s/ Reed N. Smith

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### **CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2023, the undersigned filed foregoing document using the Court's Electronic Court-Filing system, which sent notice of filing to the following counsel of record:

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Respectfully submitted,

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